

	)	Chapter 11
In re:	)	
	)	Case No. 18-50763 (AMK)
PLEASANTS CORP., <i>et al.</i> , <sup>1</sup>	)	Cases Jointly Administered under
	)	Case No. 18-50757 (AMK)
Debtors.	)	
	)	Hon. Judge Alan M. Koschik
	)	

The above-captioned debtors (collectively, the “Debtors”), by and through undersigned counsel, respectfully file this reply in support of the *Emergency Motion to Continue and Hold in Abeyance the Final Hearing and Other Deadlines Related to the Akin Gump Strauss Hauer & Feld Final Fee Application* (the “Motion”)<sup>2</sup> requesting that the Court continue and hold in abeyance Hearing on the Akin Gump Application and the Declaration Deadlines.

1 The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification  
number, are: Energy Harbor Generation LLC (0561), case no. 18-50762; Pleasants Corp. (5914), case no. 18-50763;  
Energy Harbor Nuclear Generation LLC (6394), case no. 18-50760; Energy Harbor Nuclear Corp. (1483), case no.  
18-50761; and Energy Harbor LLC (0186), case no. 18-50757. The Debtors' address is: 168 E. Market Street,  
Akron, OH 44308.

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No party is harmed by the Debtors' request to continue the Hearing or Declaration Deadlines, including specifically the OCC. The Debtors' request, moreover, is not being made for the sole purpose of delay. Moreover, the only parties affected by the relief are the Debtors, which are requesting it and Akin Gump, which is the applicant awaiting final approval of its fees and which has consented to the continuance.

Further, as set forth in the Motion, under Rule 9006 of the Bankruptcy Rules, as long as the request is made before the date set by the Court, then for cause shown, the Court can enlarge the period in its discretion with or without a motion or notice. Fed. R. Bankr. P. 9006(b)(1). The Debtors submit that cause exists to grant its Motion, for the reasons set forth therein, including because the requested declarations are related to a pending criminal investigation, as recognized by the Court in the Application Order.

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WHEREFORE, the Debtors respectfully request that the Court grant the relief requested in the Motion.

Dated: January 8, 2021

Respectfully submitted,

/s/ Bridget A. Franklin

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